

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

**JON BATTS,**

**Plaintiff,**

**v.**

**REMINGTON ARMS COMPANY,  
LLC,**

**Defendant.**

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**CASE NO: 6:17-CV-00346-ADA-JCM**

**STIPULATION REGARDING DEFENDANT REMINGTON ARMS COMPANY LLC'S  
MOTION TO EXCLUDE THE OPINION TESTIMONY  
OF PLAINTIFF'S LIABILITY EXPERT CHARLES POWELL  
AS TO PRODUCT DEFECT AND CAUSATION**

Plaintiff Jon Batts and Defendant Remington Arms Company, LLC hereby stipulate as follows:

1. Remington's Motion to Exclude the Opinion Testimony of Plaintiff's Liability Expert Charles Powell as to Product Defect and Causation (ECF No. 26), brought pursuant to FED. R. EVID. 702, *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579, and other case law set forth in the motion, is well-taken and has merit;

2. Plaintiff Jon Batts agrees with the aforementioned motion;

3. Plaintiff Jon Batts agrees that the aforementioned motion should be granted for all the reasons stated therein and that the testimony of Plaintiff's expert, Charles Powell, as to product defect and as to causation should be excluded.

SIGNED this 8th day of November, 2019.

Respectfully submitted,

By: /s/ Bryan L. Sample  
Bryan L. Sample, Admitted *Pro Hac Vice*  
Texas Bar No. 00791594  
Email: [bsample@wincorn.com](mailto:bsample@wincorn.com)  
Kenneth G. Wincorn & Associates P.C.  
1310 N. Central Expressway, Suite 1310  
Richardson, Texas 75080  
214-630-1221  
Fax 214-630-2155

***ATTORNEYS FOR PLAINTIFF***  
***JON BATTS***

By: /s/ Steven E. Danekas  
Steven E. Danekas, Admitted *Pro Hac Vice*  
Illinois Bar No. 6180496  
Email: [sdanekas@smbtrials.com](mailto:sdanekas@smbtrials.com)

OF COUNSEL:  
SWANSON MARTIN & BELL, LLP  
330 North Wabash, Suite 3300  
Chicago, Illinois 60611  
312-923-8273  
Fax 312-321-3973

and

Mitchell C. Chaney  
Texas Bar No. 04107500  
Email: [MChaney@mcginnislaw.com](mailto:MChaney@mcginnislaw.com)

OF COUNSEL:  
MCGINNIS LOCHRIDGE  
600 Congress Avenue, Suite 2100  
Austin, TX 78701  
512.495.6198  
Fax 512.499.7998

***ATTORNEYS FOR DEFENDANT***  
***REMINGTON ARMS COMPANY, LLC***